

Exhibit I

Alireza Bakhtiari

v.

Patricia Leader Frank Al-Khaledy, et al

Case No 4:11-cv-000971

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ALIREZA BAKHTIARI,

Plaintiff,

v.

PATRICIA LEADER FRANK

AL- KHALEDY, et. al.

Defendants.

Case No. 4:11-CV-000971-SNLJ

ORDER

Upon review of the submissions of Defendant Missouri College, Inc., IT IS HEREBY ORDERED that:

- (a) Plaintiff shall answer Missouri College's First Set of Interrogatories and respond to Missouri College's First Request for Production and First Request for Entry On Land For Inspection of Computers and Electronic Storage Devices within three days of this Order;
- (b) Plaintiff shall produce each of the purported e-mails described in the Complaint, or otherwise received from any current or former Missouri College student, in their original, native electronic format, as well as all copies of the purported e-mails in electronic or hard-copy form within three days of this Order;
- (c) Plaintiff shall produce all computers and any and all electronic storage devices that Plaintiff has utilized during the time period of January 1, 2009 to present for inspection and forensic imaging on a mutually agreed date within three days of this Order. Defendant Missouri College will pay for the costs of imaging.
- (d) Missouri College is authorized to issue Rule 45 subpoenas to Craigslist and to email and telephone service providers utilized by Plaintiff and/or identified by Plaintiff.
- (e) The parties may submit a mutually agreed order allowing any party to designate sensitive, confidential and/or otherwise protected information or other material as "Confidential" subject to a Protective Order. If the parties are unable to reach a mutually agreed order, any party may file a motion requesting that such information or material be subject to such an order.

IT IS FURTHER ORDERED that a Protective Order is HEREBY ENTERED as follows:

and:

- (a) Plaintiff is prohibited from destroying, deleting, tampering with or otherwise altering any electronically stored information, including, without limitation, emails and electronic documents (herein after referred to collectively as "ESI"), stored on any computer or electronic storage device that Plaintiff owns, controls, utilizes or has utilized;
- (b) Plaintiff shall maintain all ESI stored on any computer or electronic storage device that Plaintiff owns, controls, utilizes or has utilized in **original, native electronic format**.
- (c) Plaintiff is ordered to preserve all evidence relating to the claims in Plaintiff's Complaint, including, without limitation, hard copy records and ESI.

Dated: July ____, 2011

Judge

**IN THE UNITED STATES DISTRICT COURT
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ALIREZA BAKHTIARI,

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v.

PATRICIA LEADER FRANK

AL- KHALEDY, et. al.

Defendants.

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CASE NO. 4:11 CV 000971

JURY TRIAL DEMANDED

**DEFENDANT MISSOURI COLLEGE, INC.'S
FIRST SET OF INTERROGATORIES TO PLAINTIFF (EXPEDITED)**

Defendant Missouri College, Inc., improperly named as “Missouri College,” pursuant to the Federal Rules of Civil Procedure, submits its First Set of Interrogatories to Plaintiff.

I. DEFINITIONS

As used in these discovery requests, the terms listed below are defined as follows:

- A. “Person” or “persons” includes, but is not limited to, any individual, natural person, joint stock company, unincorporated association or society, municipal or other corporation, limited liability company, limited liability partnership, limited liability limited partnership, including without limitation, any party to this action, non-parties, a State, its agencies or political subdivisions, any court or any other governmental entity.
- B. “Plaintiff,” “Alireza Bakhtiari,” “Al Bakt” and the terms “You,” and “Your” mean the natural person known as Alireza Bakhtiari who is a plaintiff in this action, and any present or former agent, representative or any other person acting or purporting to act on behalf of Plaintiff.
- C. “Defendants” mean the defendants in this action, Missouri College, Inc., Karl Petersen, and Patricia Leader Frank Al-Khaledy (hereinafter referred to as Ms. Patricia Frank), including any Person Plaintiff alleges constitutes an agent of any Defendant.
- D. “Subject Letters” are the unsigned letters attached to Plaintiff’s Complaint in this action.
- E. “Subject Envelopes” are the envelopes attached to Plaintiff’s Complaint in this action.
- F. “Identify,” “identity,” and “identification,” when used to refer to an entity other than a natural person, means to state its full name, the present or last known address of its principal

office or place of doing business, and the type of entity (e.g., corporation, partnership, unincorporated association, limited liability company, limited liability partnership, etc.).

G. "Identify," "identity" and "identification," when used to refer to a natural person, means to state the person's full name and present or last known home address, home telephone number, last known place of employment, employment title, business address and business telephone number.

II. INSTRUCTIONS

A. In answering these interrogatories, all information is to be divulged that is within the knowledge, possession or control of you or your agents, or that may be reasonably ascertained by you or them.

B. Where appropriate in these interrogatories, the singular form of a word shall be interpreted as plural and the plural form of a word shall be interpreted as singular.

C. Where appropriate in these interrogatories, "and" and "or" shall be construed either disjunctively or conjunctively, as necessary, to bring under the scope of these interrogatories any information which might otherwise be construed to be outside of their scope.

D. If any document or material responsive to these interrogatories is no longer in existence or in Your possession, state the reason why such document and/or material is no longer in existence and identify the person presently in possession of the document and/or material.

E. In answering these interrogatories, all documents and materials are to be divulged that are within Your knowledge, possession or control or that may be reasonably ascertained by You.

F. These interrogatories shall be deemed continuing to the full extent provided by Rule 26(e) of the Federal Rules of Civil Procedure. Where additional information is obtained subsequent to the time the answers to these interrogatories are served, such answer shall be supplemented not later than thirty (30) days after such additional information is received, and in no event later than the last date upon which discovery is required to be completed in accordance with the scheduling orders of the court in this action.

G. Interrogatories which cannot be answered in full shall be answered as completely as possible, and incomplete answers shall specify the reasons for the incompleteness, as well as setting forth whatever knowledge, information or belief you possess with regard to each unanswered or partially answered interrogatory.

INTERROGATORIES

1. Identify every computer and electronic storage device utilized by Plaintiff during the time period of January 1, 2009 to present. For each such computer and device, state the following:

- a. the manufacturer, model, serial number, and IP address;
- b. the owner(s);
- c. the date when Plaintiff began utilizing each such computer/device;
- d. if applicable, the date when Plaintiff stopped utilizing each such computer/device;
- e. the current location of each computer/device;
- f. whether Plaintiff utilized such computer/device to send, receive, review and/or reply to emails from individuals Plaintiff contends or believes are current or former employees of Missouri College;
- g. whether Plaintiff utilized such computer/device to send, receive, review and/or reply to the alleged emails referenced in Paragraph 16 of Plaintiff's Complaint in this Action; and
- h. whether Plaintiff utilized such computer to send, receive, review and/or reply to the alleged emails referenced in Paragraph 15 of Plaintiff's Complaint filed in *Bakhtiari v. Missouri College, et al.*, Cause No. 4:10-cv-01856SNLJ.

ANSWER:

2. For each email address, including without limitation, *al_bakt@hotmail.com*, utilized by Plaintiff to receive and/or respond to the alleged emails referenced in Paragraph 16 of Plaintiff's Complaint in this action and/or the alleged emails in Paragraph 15 of Plaintiff's Complaint filed in *Bakhtiari v. Missouri College, et al.*, Cause No. 4:10-cv-01856SNLJ, please identify the following:

- a. the email address;
- b. the name of the account holder;
- c. the date when Plaintiff began utilizing each such email address;
- d. if applicable, the date when Plaintiff stopped utilizing each such email address; and
- e. if applicable, the name, address and phone number of any Person other than Plaintiff who utilized each such email address.

ANSWER:

3. For each telephone number, including without limitation, 314.277.1958, utilized by Plaintiff to receive and/or respond to the alleged telephone calls referenced in Paragraph 16 of Plaintiff's Complaint in this action and/or the alleged telephone calls in Paragraph 15 of Plaintiff's Complaint filed in *Bakhtiari v. Missouri College, et al.*, Cause No. 4:10-cv-01856SNLJ, please identify the following:

- a. the phone number including area code;
- b. the name, address and phone number of the mobile phone company, local exchange carrier and/or other company providing telephone service for each number;
- c. the name of the account holder;
- d. the date when Plaintiff began utilizing each such telephone number;
- e. if applicable, the date when Plaintiff stopped utilizing each such telephone number;
- f. if applicable, the name, address and phone number of any Person, other than Plaintiff, who utilized each such telephone number.

ANSWER:

4. Identify each and every student, former student, and/or other individual you believe was or is affiliated with any defendant who contacted you (whether in-person, via telephone, email or otherwise) and inquired if you would offer them job opportunities in Las Vegas, including without limitation, the three individuals you allege approached you and a business associate in the Venetian Hotel. See Paragraphs 15-16 of Plaintiff's Complaint filed in *Bakhtiari v. Missouri College, et al.*, Cause No. 4:10-cv-01856SNLJ. For each such purported student, former student or individual, identify:

- a. his/her name;
- b. the dates when you communicated;
- c. the means by which you communicated (email, phone, etc.);
- d. who initiated each communication;
- e. the telephone number(s), email address(es) or other means utilized during each communication; and
- f. any person who witnessed or participated in such contacts/communications, including, without limitation, the business associate you allege was with you when the three individuals allegedly approached you in the Venetian Hotel.

ANSWER:

5. Identify any Person, including without limitation, anyone affiliated with the Jefferson County Sheriff's Office, who can substantiate or otherwise support Plaintiff's allegation in paragraph 30 of the Complaint in this action that the "Jefferson County Sheriff investigated this letter. In the process of this investigation, Plaintiff has been wrongfully arrested, imprisoned and prosecuted."

ANSWER:

6. Identify each person who has had custody of or who has examined any of the following:
- a. Any of the original Subject Letters;
 - b. Any of the original Subject Envelopes.

ANSWER:

Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Bradley S. Hiles

Bradley S. Hiles, #28907MO
brad.hiles@huschblackwell.com
Glennon P. Fogarty, #42983MO
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Telephone: (314) 480-1500
Fax: (314) 480-1505

Attorneys for Defendant Missouri College, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was filed electronically with the Court's CM/ECF system and served upon:

Paul F. Devine, Esq.
Vatterott, Harris, Devine & Kwentus, P.C.
2458 Old Dorsett Road, Suite 230
Maryland Heights, Missouri 63043
314-770-2100
314-770-9330 (fax)
Counsel for Defendant Patricia Leader Frank Al-Khaledy

and was served by First Class U.S. mail upon:

Alireza Bakhtiari
P.O. Box 18601
St. Louis, Missouri 63108

on this 12th day of July, 2011.

/s/ Bradley S. Hiles

ATTESTATION

STATE OF _____)
)
COUNTY OF _____) ss.

_____, being first duly sworn on oath, deposes and states that Alireza Bakhtiari is the Plaintiff in the above-captioned matter, that Alireza Bakhtiari has read the foregoing document, and that the answers made herein are true, correct and complete to the best of his knowledge and belief.

The foregoing answers to interrogatories were subscribed and sworn to before me this ____ day of _____, 2011.

Notary Public

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ALIREZA BAKHTIARI,

Plaintiff,

v.

PATRICIA LEADER FRANK

AL- KHALEDY, et. al.

Defendants.

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CASE NO. 4:11 CV 000971

JURY TRIAL DEMANDED

**DEFENDANT MISSOURI COLLEGE, INC.'S
FIRST REQUESTS FOR PRODUCTION TO PLAINTIFF (EXPEDITED)**

Defendant Missouri College, Inc., improperly named as "Missouri College," pursuant to the Federal Rules of Civil Procedure, submits its First Requests for Production to Plaintiff pursuant to Rule 34 of the Federal Rules of Civil Procedure.

DEFINITIONS AND INSTRUCTIONS

As used in these requests, the terms listed below are defined as follows:

(a) The Definitions contained in Defendant Missouri College, Inc.'s First Set of Interrogatories to Plaintiff are incorporated herein by reference.

(b) With respect to any document responsive hereto which was but is no longer in your possession or subject to your control, you shall submit a statement setting forth as to each such document what disposition was made of it.

(c) Documents and materials are to be produced separately, as far as reasonably practical according to each of the numbered paragraphs set forth below and defendant is to indicate with respect to each group of the documents produced the paragraph to which the group is responsive.

REQUESTS FOR PRODUCTION

1. All computers and any and all electronic storage devices that Plaintiff has utilized during the time period of January 1, 2009 to present for inspection and forensic imaging (Defendant Missouri College will pay for the costs of imaging).

RESPONSE:

2. Plaintiff's phone bills, and any other record identifying calls, whether in-coming, outgoing or otherwise, during the time period of January 1, 2009 to present.

RESPONSE:

3. Each of the purported emails

- a. described in Paragraph 16 of Plaintiff's Complaint in this action;
- b. described in Paragraph 15 of Plaintiff's Complaint filed in *Bakhtiari v. Missouri College, et al.*, Cause No. 4:10-cv-01856SNLJ,
- c. which comprise the "Las Vegas directed job requests" as referenced in Plaintiff's June 1, 2011 letter directed to Career Education Corporation, and
- d. which Plaintiff contends support Plaintiff's allegations in this action,

with all such emails and electronically stored information to be produced in their original, native electronic format and in hard copy.

RESPONSE:

4. A copy of all written communications, including without limitation, correspondence, emails, text messages, faxes, whether hard copy or electronic, to or from Plaintiff and any of the following: the Jefferson County Sheriff's Office, Mississippi County Family Services, the Missouri Department of Social Services, KSDK, FOX 2, KTVI, KMOV, and/or KPLR 11. **All electronically stored information or documents to be produced in their original, native electronic format and in hard copy.**

RESPONSE:

5. All documents and/or materials that are either identified in or on which you intend to rely to support any of the answers or contentions set out in your answers to interrogatories and/or responses to these requests to produce propounded to you by Defendant. **All electronically stored information or documents to be produced in their original, native electronic format and in hard copy.**

RESPONSE:

Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Bradley S. Hiles

Bradley S. Hiles, #28907MO
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Attorneys for Defendant Missouri College, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was filed electronically with the Court's CM/ECF system and served upon:

Paul F. Devine, Esq.
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2458 Old Dorsett Road, Suite 230
Maryland Heights, Missouri 63043
314-770-2100
314-770-9330 (fax)
Counsel for Defendant Patricia Leader Frank Al-Khaledy

and was served by First Class U.S. mail upon:

Alireza Bakhtiari
P.O. Box 18601
St. Louis, Missouri 63108

on this 12th day of July, 2011.

/s/ Bradley S. Hiles

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ALIREZA BAKHTIARI,

Plaintiff,

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PATRICIA LEADER FRANK

AL- KHALEDY, et. al.

Defendants.

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CASE NO. 4:11 CV 000971

JURY TRIAL DEMANDED

**DEFENDANT MISSOURI COLLEGE, INC.'S FIRST REQUEST
FOR ENTRY ON LAND FOR INSPECTION OF COMPUTERS AND
ELECTRONIC STORAGE DEVICES (EXPEDITED)**

Defendant Missouri College, Inc., improperly named as "Missouri College," pursuant to the Federal Rules of Civil Procedure, submits its First Requests for Entry On Land For Inspection of Computers and Electronic Storage Devices (Expedited) pursuant to Rule 34 of the Federal Rules of Civil Procedure.

INSTRUCTIONS AND DEFINITIONS

1. Emails and electronically stored information relating to Plaintiff's claims may be critical pieces of evidence that must be preserved.
2. Missouri College requests that its counsel and representatives be afforded entry upon the areas and locations where computers and/or electronic storage devices utilized by Plaintiff are maintained.
3. Missouri College requests entry on land and access so as to inspect, inventory, photograph and image Plaintiff's computers and electronic storage devices.
4. If any item, document or material responsive to these requests is no longer in existence or in your possession, state the reason why it is no longer in existence and/or identify

the person presently in possession of the item, document and/or material.

DEFINITIONS AND INSTRUCTIONS

As used in these requests, the terms listed below are defined as follows:

(a) The Definitions contained in Defendant Missouri College, Inc.'s First Set of Interrogatories to Plaintiff are incorporated herein by reference.

REQUESTS FOR INSPECTION AND IMAGING

1. All computers and any and all electronic storage devices that Plaintiff has utilized during the time period of January 1, 2009 to present for inspection and forensic imaging (Defendant Missouri College will pay for the costs of imaging).

RESPONSE:

Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Bradley S. Hiles

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Attorneys for Defendant Missouri College, Inc.

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St. Louis, Missouri 63108

on this 12th day of July, 2011.

/s/ Bradley S. Hiles